



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

JAN 14 2013

Scott Samuelson, Manager  
U.S. Department of Energy  
Office of River Protection  
P.O. Box 550  
Richland, Washington 99352

Re: Comments on the Final Tank Closure and Waste Management EIS for the Hanford Site,  
Richland, WA (EPA Region 10 Project Number: 06-004-DOE).

Dear Mr. Samuelson:

In accordance with our authorities under Section 309 of the Clean Air Act and the National Environmental Policy Act, the U.S. Environmental Protection Agency has reviewed the Department of Energy's final Environmental Impact Statement for the proposed **Tank Closure and Waste Management (TC&WM) Project** (CEQ# 20120385) at the Hanford Site in Benton County, Washington State.

In our comments on the draft EIS in May 2010, the EPA expressed environmental objections to the proposed action due to serious concerns about potential impacts to groundwater, stability of radionuclides in secondary waste, and modeling information. In our capacity as a cooperating agency on this final EIS, we also reviewed and provided comments on preliminary and draft final EIS documents, focusing primarily on DOE's responses to our comments on the DEIS.

We recognize and appreciate changes made to the EIS that address issues raised in our comments. Specifically, the final EIS includes additional clarifying information and analyses regarding tank closure. While the EPA supports aspects of the preferred alternative for tank closure (e.g. retrieval of 99 percent of the tank waste), we are concerned about the remaining uncertainties regarding treatment of contamination in the vadose zone under the tanks and potential impacts to groundwater.

As stated, the preferred alternative for tank closure is stated as preferences for goals and conditions with additional statements about plans and actions that could occur. Also, we note that DOE has not identified a preferred alternative for supplemental treatment of low activity waste. Additional NEPA analysis will be necessary to inform more specific decisions. We understand that DOE intends to develop a mitigation action plan. We recommend that the mitigation plan development process include opportunities for the public to comment.

The EPA's primary interest continues to be a desire for clear indication that combined cleanup actions at Hanford will result in conditions that are protective of human health and the environment. We will continue to coordinate with DOE and other agencies through our regulatory roles in CERCLA, RCRA and the Tri-Party Agreement. Thank you for the opportunity to provide comments on this final EIS. If you have questions about our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or contact Theo Mbabaliye of my staff at (206) 553-6322 or by electronic mail at [mbabaliye.theo@epa.gov](mailto:mbabaliye.theo@epa.gov).

Sincerely,



Christine B. Reichgott, Manger  
Environmental Review and Sediment Management Unit